

DOCKET NO.	DATE FILED	U.S. DISTRICT COURT	
PLAINTIFF		DEFENDANT	
PATENT OR TRADEMARK NO.	DATE OF PATENT OR TRADEMARK	HOLDER OF PATENT OR TRADEMARK	
1			
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DATE INCLUDED	INCLUDED BY <input type="checkbox"/> Amendment <input type="checkbox"/> Answer <input type="checkbox"/> Cross Bill <input type="checkbox"/> Other Pleading	
PATENT OR TRADEMARK NO.	DATE OF PATENT OR TRADEMARK	HOLDER OF PATENT OR TRADEMARK
1		
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DECISION/JUDGEMENT
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Copy 1—Upon initiation of action, mail this copy to Director      Copy 3—Upon termination of action, mail this copy to Director  
Copy 2—Upon filing document adding patent(s), mail this copy to Director      Copy 4—Case file copy

## GOLDBERG KOHN LTD.

November 2, 2018

robert.leighton@goldbergkohn.com  
direct phone: 312.863.7194  
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### VIA U.S. MAIL & E-MAIL

David Chaimovitz  
Aero Trade, LLC  
1700 W Fulton St.  
Chicago, IL 60612  
david@aerotrade.com

Re: Infringement of Aertrade LLC's Trademark Rights

Dear Mr. Chaimovitz:

This firm represents Aertrade LLC ("Aertrade"), a leader in the business of purchasing, leasing, and exchanging of aviation engines, parts, and airframe rotatable components and accessories. Aertrade is based in Chicagoland and serves customers throughout the United States and internationally. Since 2007, Aertrade has used the trademark AERTRADE and, through its use and promotion of the mark, acquired valuable goodwill and public recognition.

It has recently come to our attention that Aero Trade LLC ("ATL") is using the name AERO TRADE in connection with its Chicago-based business providing rotatable components for commercial, regional and business aircraft. This trademark is nearly identical to the AERTRADE mark and is used in connection with goods and services that are nearly identical to those of Aertrade. Indeed, the marks differ by only the letter "O" and the companies are direct competitors, both based in Chicagoland.

Given the similarity of the marks and products at issue, ATL's use of the use of AERO TRADE mark is very likely to confuse consumers as to the source, association, affiliation, or sponsorship of ATL's goods and services with those of Aertrade. In fact, Aertrade has been made aware of a number of instances of actual confusion that have already occurred.

In light of its well established rights in the AERTRADE mark, Aertrade demands that ATL immediately and permanently discontinue any use of the mark AERO TRADE or any similar mark in connection with aviation parts or services.

Our client prefers an amicable resolution of this matter, but is obliged to protect its valuable intellectual property rights. We ask that you promptly provide written confirmation that you will comply with this request. If we do not receive a satisfactory response by the close of business on November 16, 2018, Aertrade is prepared to take all steps necessary to protect its intellectual property rights, without further notice.

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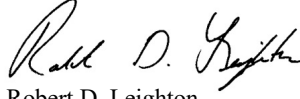
 MERITAS LAW FIRMS WORLDWIDE

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This letter is written without waiver of or prejudice to any of our client's rights or remedies, all of which are expressly reserved. Please feel free to contact me to discuss.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert D. Leighton". The signature is fluid and cursive, with the first name "Robert" being the most prominent.

Robert D. Leighton

cc: Jason Kozin, Registered Agent (via email)  
[jasonk@imperialgp.com](mailto:jasonk@imperialgp.com)